

# **EXHIBIT 1**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

RACHEL LYNN WILLIAMSON and  
CONSTANCE NOVOA, on behalf of  
themselves and all others similarly  
situated,

Plaintiffs,

Case No. 1:24-cv-01526-TWP-MJD

v.

GERARDO LORENZO LINARDUCCI,  
an Indiana individual,  
INTEGRITY WEALTH PARTNERS, LLC, an  
Indiana limited liability corporation, and  
DUCCI ENTERPRISES, LLC, an  
Indiana limited liability corporation,

Defendants.

**DECLARATION OF ROSS GOOD**

Pursuant to 28 U.S.C. § 1746, the undersigned states as follows:

1. I am an attorney licensed to practice law residing in Cook County, Illinois.
2. I represent Plaintiffs Rachel Lynn Williamson and Constance Novoa in the above-captioned matter.
3. I have personal knowledge of the facts stated herein and am competent to testify thereto.
4. I submit this declaration to address and rebut the factual assertions contained in the Declaration of Gerardo Lorenzo Linarducci filed as Dkt. 39-1 ("Linarducci Declaration") in support of Defendants' Motion to Dismiss, and to provide the Court with a list of identified putative class members who invested in the REAL investment program promoted by Defendants.
5. Attached hereto as Exhibit 2 is a subset of only Defendants' investors in DRIVE

and their most recent investment date.

6. Exhibit 2 identifies 110 distinct investors, including at least 50 investors (over 45%) residing outside Indiana.

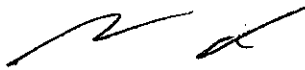
7. Exhibit 2 shows that at least 110 investors made initial investments in the REAL program between 2022 and 2024.

8. Exhibit 2 reflects that investors resided in at least 13 different states:

CA	1	1%
FL	6	5%
GA	11	11%
IL	1	1%
IN	60	54%
MD	1	1%
NC	2	2%
NE	5	4%
NJ	12	11%
NY	3	3%
OH	4	4%
OR	1	1%
PA	3	3%
TOTAL	110	

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 10/16/2025.



Ross Good